



ARKANSAS
Department of Environmental Quality

April 22, 2009

Amec Consultants, Inc.
Attn: Kelly Beck, P.G.
5725 Hwy 290 West, Suite 200B
Austin, TX 78735

RE: Facility Investigation Report for Cedar Chemical Company (February 2009)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Beck:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the Facility Investigation Report (FIR) dated February 2009. Based on ADEQ review, the following deficiencies and/or concerns have been noted:

- Section 4 of the FIR indicates historical data comparisons were made on the alluvial aquifer presented in Table 11. Were any historical data comparisons made on the perched aquifer?
- Where is the historical data listed in Table 11 referenced from?
- Appendix F; Wells number 1 and 2 appear to be improperly located on the well location map. Well number 2 appears to be on Cedar property and well number 1 is located north of the Norac property.
- Figure 2 – Suspected Source Areas does not include the former surface water ponds and the current waste water treatment ponds, which were mentioned in the report.
- Page 20, 3rd Paragraph – This paragraph states 4-chloroaniline was detected within the drum vault at concentrations ranging from 4.0 to 11.0 mg/kg. Table 6 indicates 4-chloroaniline was detected from 5.0 to 11.0 mg/kg. Please correct either the narrative or Table 6.

Please prepare a response to each of the items noted above and submit to ADEQ within thirty (30) days of receipt of this letter. If you have any questions or need additional information, please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,

J. Ryan Benefield, P.E.
Acting Hazardous Waste Division Chief

cc: Mark Hemingway, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
 Dave Roberson (DeMaximis, Inc. 2203 Timberloch Place, Suite 213 The Woodlands, TX 77380)
 Anne Weinstein, Attorney Specialist, ADEQ
 Dara Hall, Attorney Specialist, ADEQ
 Allan Gates (Mitchell Williams Selig Gates & Woodyard, PLLC, 425 West Capitol Avenue, Suite 1800, Little Rock, AR 72201-3525)
 Joe Ghormley (Quattlebaum, Grooms, Tull & Burrow, PLLC, 111 Center Street, Suite 1900, Little Rock, AR 72201)
 Deborah D. Kuchler (Abbott, Simeses & Kulcher, 400 Lafayette St. Suite 200, New Orleans, LA 70130)
 Edward Brister (Helena Chemical Co., 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
 Dan Burnham (3225 Gallows Road, Suite 8B 0607, Fairfax, VA 22037)
 Ann Faitz (Attorney at Law, 585 Silverwood, North Little Rock, AR 72116)
 David Hawkins (General Counsel & Assistant Secretary, 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
 Kim Burke (Taft, Stettinius & Hollister LLP, 425 Walnut Street, Suite 1800, Cincinnati, OH 45202-3957)
 Mark Zuschek (3225 Gallows Road, Suite 3D 2110, Fairfax, VA 22039)